

# BARKER, GELFAND, JAMES & SARVAS

ATTORNEYS AT LAW  
A PROFESSIONAL CORPORATION

**Atlantic County Office:**  
210 New Road  
Linwood Greene – Suite 12  
Linwood, New Jersey 08221  
(609) 601-8677  
(609) 601-8577 – Telefax

A. MICHAEL BARKER \*  
TODD J. GELFAND \*\*  
VANESSA E. JAMES \*\*+  
JEFFREY P. SARVAS

GREG DiLORENZO  
ADAM E. BARKER

\* CERTIFIED BY THE SUPREME COURT OF  
NEW JERSEY AS A CIVIL TRIAL ATTORNEY  
\*\* LICENSED TO PRACTICE IN PENNSYLVANIA  
+ ASSOCIATION OF WORKPLACE  
INVESTIGATORS – CERTIFICATE HOLDER

Website: [www.barkerlawfirm.net](http://www.barkerlawfirm.net)  
e-mail: [TGelfand@BarkerLawFirm.net](mailto:TGelfand@BarkerLawFirm.net)

**Burlington County Office:**  
1 Eves Drive, Suite 111  
Marlton, New Jersey 08053  
(609) 601-8677  
(609) 601-8577 – Telefax  
E-Mail:  
[TGelfand@BarkerLawFirm.net](mailto:TGelfand@BarkerLawFirm.net)

*By Appointment Only*

**Gloucester County Office:**  
91 Circle Avenue  
Pitman, New Jersey 08071  
(856) 244-1854  
Email: [VJames@BarkerLawFirm.net](mailto:VJames@BarkerLawFirm.net)  
*By Appointment Only*

PLEASE REPLY TO  
**ATLANTIC COUNTY OFFICE**

March 24, 2025

Magistrate Judge Matthew J. Skahill  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

Re: John J. Walsh, Jr. v. Township of Galloway, Township of Mullica, Police Officer Hardikkumar Patel, Police Officer Robert Winkel, Police Officer Lupinetti, and Mullica Chief of Police, Brian J. Zeck  
Civil Docket: 1:22-cv-03336-KMW-MJS

Dear Judge Skahill:

We represent the Defendants, Township of Galloway, Township of Mullica, Police Officer Hardikkumar Patel, Police Officer Robert Winkel, and Police Officer Lupinetti, in the above-captioned case. Please accept this letter brief in lieu of a more formal brief in support of Defendants' Motion to Seal Exhibit 1

Page 2

March 21, 2025

Magistrate Judge Matthew J. Skahill

Re: John J. Walsh, Jr. v. Township of Galloway, Township of Mullica, Police Officer Hardikkumar Patel, Police Officer Robert Winkel, Police Officer Lupinetti, and Mullica Chief of Police, Brian J. Zeck  
Civil Docket #: 1:22-cv-03336-KMW-MJS

of the Defendants' reply brief in support of their motion for summary judgment (ECF No. 83-1).

On this date the Defendants filed a Reply Brief in support of their Motion for Summary Judgment. Enclosed with that motion is one exhibit. Defendants request that this exhibit be filed under seal because it contains confidential information about the Plaintiff, specifically certain personal identifiers, such as Plaintiff's date of birth which were mistakenly not redacted. Public disclosure of this information could be potentially harmful to Plaintiff. The plaintiff has consented to the filing of Exhibit 1 (ECF No. 83-1) under seal.

Thank you for your consideration.

Very truly yours,

**BARKER, GELFAND & JAMES  
a Professional Corporation**

By: s/Todd J. Gelfand  
JPS/tjg Todd J. Gelfand, Esquire

CC:

*RICHARD M. WIENER  
Attorney for Plaintiff*